

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA (Philadelphia)**

IN RE: JACQUELYN OWENS Debtor	Case No. 24-14349-pmm
Freedom Mortgage Corporation, Movant	Chapter 13
vs. JACQUELYN OWENS And Chester Freeman, Jr, (NON-FILING CO-DEBTOR) Respondents	11 U.S.C. §362 and §1301

CERTIFICATION OF DEFAULT

BROCK AND SCOTT, PLLC, attorneys for Movant, hereby certifies that the above-captioned Debtor has failed to comply with the terms of the Stipulation approved by the U.S. Bankruptcy Judge on April 15, 2025.

In accordance with the terms of said Stipulation agreed to by the parties, the Automatic Stay is hereby lifted as to permit Movant to proceed with their State Court remedies upon Debtor's failure to cure the default.

/s/Mario Hanyon

Andrew Spivack, PA Bar No. 84439

Mario Hanyon, PA Bar No. 203993

Ryan Srnik, PA Bar No. 334854

Jay Jones, PA Bar No. 86657

Attorney for Creditor

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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**
Philadelphia Division

IN RE:

JACQUELYN OWENS

Case No. 24-14349-pmm
Chapter 13

Freedom Mortgage Corporation,
Movant

vs.

JACQUELYN OWENS ,
Debtor
And
Chester Freeman, Jr
Co-Debtor

CERTIFICATE OF SERVICE

I, the undersigned, certify that on June 18, 2025, I did cause a true and correct copy of the documents described below to be served on the parties listed on the mailing list exhibit, a copy of which is attached and incorporated as if fully set forth herein, by the means indicated and to all parties registered with the Clerk to receive electronic notice via the CM/ECF system:

- Certification of Default

I certify under penalty of perjury that the above document was sent using the mode of service indicated.

Date: June 18, 2025

/s/Mario Hanyon

Andrew Spivack, PA Bar No. 84439

Mario Hanyon, PA Bar No. 203993

Ryan Srnik, PA Bar No. 334854

Jay Jones, PA Bar No. 86657

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Mailing List Exhibit: (Check all that apply. If via e-mail, include e-mail address. Continue to the next page if necessary.)

Brad J Sadek, Debtor's Attorney
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Debtor's Attorney

Via: ☒ CM/ECF ☐ 1st Class Mail ☐ Certified Mail ☐ e-mail:
☐ Other:

KENNETH E. WEST,
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Suite 701
Philadelphia, PA 19106
Bankruptcy Trustee

Via: ☒ CM/ECF ☐ 1st Class Mail ☐ Certified Mail ☐ e-mail:
☐ Other:

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Robert N.C. Nix Federal Building
900 Market Street Suite 320
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US Trustee

Via: ☒ CM/ECF ☐ 1st Class Mail ☐ Certified Mail ☐ e-mail:
☐ Other:

JACQUELYN OWENS
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Debtor

Via: ☐ CM/ECF ☒ 1st Class Mail ☐ Certified Mail ☐ e-mail:
☐ Other:

Chester Freeman, Jr
635 Keely Ct
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Co-Debtor

Via: ☐ CM/ECF ☒ 1st Class Mail ☐ Certified Mail ☐ e-mail:
☐ Other: